

REMARKS

Applicant thanks the Examiner for discussing the office action and in particular the Rostoker et al. (U.S. Patent No. 6,407,434) reference in relation to claim 1 with Applicant on October 29, 2003.

Claims 1-15 are pending in the Application.

Claims 4-15 are withdrawn from consideration and hence claims 1-3 remain pending in the Application.

Claim 1 is rejected under 35 U.S.C. § 102(e).

Claim 16 is added and hence claims 1-3 and 16 are pending.

Applicant respectfully traverses the rejection for at least the reasons provided below and respectfully request the Examiner to reconsider and withdraw the rejection to claim 1.

I. RESTRICTION REQUIREMENT:

Applicant affirms the election of group I with traverse for at least the reasons stated in a telephone conversation Mr. Kelly K. Kordzik had with Examiner Siek on July 4, 2003.

II. REJECTIONS UNDER 35 U.S.C. § 102(e):

The Examiner has rejected claim 1 under 35 U.S.C. § 102(e) as being anticipated by Rostoker et al. (U.S. Patent No. 6,407,434) (hereinafter "Rostoker"). Applicant respectfully traverses this rejection for at least the reasons provided below and respectfully requests the Examiner to reconsider and withdraw this rejection.

For a claim to be anticipated under 35 U.S.C. § 102, each and every claim limitation must be found within the cited prior art reference and arranged as required by the claim. M.P.E.P. § 2131.

Applicant respectfully asserts that Rostoker does not disclose "a second chip located adjacent to said first chip, wherein said second chip is interconnected with said first chip by one or more orthogonal interconnections" as recited in claim 1. The

Examiner cites Figures 9 and 104, column 91, columns 32-52 and column 88, lines 8-67 as disclosing the above-cited claim limitation. Paper No. 3, page 4. Applicant respectfully traverses and asserts that Rostoker instead discloses rectilinear routing that may be used in the area of a single chip such as illustrated in Figure 104. Rostoker does not disclose any type of routing between two or more chips in a module. Thus, Rostoker does not disclose all of the limitations of claim 1, and thus Rostoker does not anticipate claim 1. M.P.E.P. § 2131

Applicant respectfully further asserts that Rostoker does not disclose "a third chip located diagonal to said first chip, wherein said third chip is interconnected with said first chip by one or more diagonal interconnections, wherein said one or more ~~diagonal interconnections between said first chip and said third chip are~~ interconnected between a first set of pins located on said first chip and a second set of pins located on said third chip, wherein a pattern formed by said first set of pins and said second set of pins is a triangular pattern" as recited in claim 1. The Examiner cites Figures 9 and 104 as well as column 91, columns 32-52 and column 88, lines 8-67 of Rostoker as disclosing the above-cited claim limitation. Paper No. 3, page 4. Applicant respectfully traverses and asserts that Rostoker instead discloses that cells may be interconnected using tri-directional routing as illustrated in Figure 8. However, each cell is not equivalent to a chip in a multiple chip module. Instead, a cell as described in Rostoker is equivalent to a circuit in an integrated circuit. Hence, Rostoker does not disclose a third chip interconnected with a first chip by one or more diagonal interconnections. Further, Rostoker does not disclose that each cell contains a set of pins. Further, Rostoker does not disclose that a set of pins located on a first and a third chip are interconnected via one or more diagonal interconnections. Further, Rostoker does not disclose a pattern formed by the first and second set of pins is a triangular pattern. Instead, Rostoker discloses that the routing interconnecting points in three cells may extend in three directions that make angles 60 degrees relative to each other. Routing in a triangular pattern is not the same as a triangular pattern formed by a first and second set of pins located on a first and third chip. Thus, Rostoker does not disclose all of the limitations of claim 1, and thus Rostoker does not anticipate claim 1. M.P.E.P. § 2131.

Applicant further asserts that Rostoker does not disclose "wherein said first and said second chip are rotated ninety degrees with respect to one another" as recited in claim 16. Thus, Rostoker does not disclose all of the limitations of claim 16, and thus Rostoker does not anticipate claim 16. M.P.E.P. § 2131.

As a result of the foregoing, Applicant respectfully asserts that not each and every claim limitation was found within the cited prior art reference, and thus claims 1 and 16 are not anticipated by Rostoker.

III. ALLOWABLE SUBJECT MATTER:

Claims 2-3 are objected to as being dependent upon a rejected base claim, but ~~would be allowable if rewritten in independent form including all of the limitations of~~ the base claim and any intervening claims. Paper No. 3, page 4. Applicant appreciates the indication of allowability of claims 2-3.

IV. CONCLUSION

As a result of the foregoing, it is asserted by Applicant that claims 1-3 and 16 in the Application are in condition for allowance, and Applicant respectfully requests an allowance of such claims. Applicant respectfully requests that the Examiner call Applicant's attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining issues.

Respectfully submitted,

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Attachments

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APPENDIX

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